September 9, 1998

This document was submitted to EPA by a registrant in connection with EPA's evaluation of this chemical and it is presented here exactly as submitted.

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29/OPP#34134

Bayer

FAX COVER SHEET

NOTICE OF CONFIDENTIALITY

Date: February 26, 1996

No. of Pages (including this page): 1

To: Ron Kendall

From: Melvin K. Tolliver

Company: EPA

Department: R & D, Registrations Section

Fax: (703) 308-8773 or 308-7042 or 308-8005

Fax: (816) 242-2738

Phone: (703) 308-8154

Phone: (816) 242-2150

SUBJECT: Fenamiphos (Nemacur) 17 Day Reentry

On February 1, 1996 I met with you and Kathleen Depukat on fenamiphos. During our meeting, a question arose on the proper re-entry interval. Should it be 17 days or 48 hours as stated on our Nemacur labels? Since I was not familiar with where the 17 days came from, I agreed to look into the situation.

As we suspected in our meeting, a 17-day re-entry period is mentioned in our pineapple foliar residue dissipation study (GDLN 132-1(a)), which was submitted to the Agency on 6/3/91 as part of the reregistration requirements and assigned MRID No. 41901701. The Agency found this study acceptable as indicated in their February 13, 1995 letter (Esther Saito to John S. Thornton).

This study states that the mean number of days for the residue to decay to a safe level (re-entry interval) was 17 days. However, the report also states that this interval is conservative because worker contact with the sharp rigid pineapple leaves is more limited than with foliage from other plants and the transfer coefficient, therefore, overestimates the exposures of pineapple workers. Please note that the use on pineapple is the only foliar application on our label except for the use on turf. All other applications are made to the soil. Applications to turf and soil applications are to be incorporated by irrigation or mechanical means.

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